

f1gures.com

Privacy Policy

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This Privacy Policy describes how F1GURES PTE. LTD. ("Company", "we", "us", or "our") collects, uses, discloses, processes, and protects personal data through the use of the f1gures.com platform, website, mobile applications, and related services (collectively, the "Platform").

We are committed to protecting personal data in accordance with Singapore's Personal Data Protection Act 2012 ("PDPA") and applicable data protection laws.

By accessing or using the Platform, you acknowledge that you have read and understood this Privacy Policy, and consent to us processing your personal data in accordance with this Privacy Policy. Where required by law, we will obtain your specific consent before collecting or processing your personal data, particularly for sensitive financial information and marketing communications. Blanket acceptance of these terms does not substitute for such specific consents where required.

1. Scope of This Privacy Policy

This Privacy Policy applies to:

- Financial advisers using our Platform;
- Individuals whose personal data is entered into the Platform by financial advisers;
- Users of our services.

Where financial advisers collect or input personal data of their clients into the Platform, such advisers remain responsible for ensuring that they have obtained all necessary consents and authorisations required under applicable laws. Please refer to Section 16 (Data Controller and Data Intermediary) for further detail on how responsibilities are allocated between the Company and adviser firms.

2. Personal Data We Collect

"Personal data" refers to data about an individual who can be identified from that data, or from that data together with other information to which we may have access.

We may collect the following categories of personal data:

a. Identity & Contact Information

- Full name
- Email address
- Phone number
- Mailing address
- Company or organisation details

b. Account Information

- Login credentials
- User IDs
- Authentication information
- Account preferences

c. Financial & Planning Information

Depending on how the Platform is used, we may process:

- Income and expense information
- Financial goals
- Investment information
- Insurance-related information
- Retirement planning information
- Asset and liability information
- Cash flow projections

Financial and planning information is treated with heightened sensitivity. Access to this category of data is restricted to authorised personnel and to the financial adviser(s) associated with your account, and is subject to enhanced security controls described in Section 8.

d. Technical & Usage Information

We may automatically collect the following information from users of the Platform:

- IP address
- Browser type and version
- Device information
- Operating system
- Access timestamps
- Usage analytics
- Navigation and interaction data
- Cookies and tracking identifiers

e. Communications

Information contained in enquiries, feedback submissions, support requests, or other communications with us.

3. How We Collect Personal Data

We may collect personal data:

- Directly from users during registration or use of the Platform;
- From financial advisers who input client information;
- Through cookies and analytics technologies;
- Through communications with us;
- From third-party integrations authorised by users.

If you have provided personal data of individuals other than yourself to the Company, you confirm that you have (i) informed these individuals of the purposes for collection, use and disclosure of their personal data as set out in this Privacy Policy, and (ii) sought the requisite consent from these individuals to the collection, use and disclosure of their personal data.

4. Purposes for Collection, Use and Disclosure

We may collect, use, disclose, and process personal data for the following purposes:

- Providing and operating the Platform;
- Delivering financial planning tools and related services, including tracking of financial scenarios;
- Managing user accounts and authentication;
- Facilitating communication between users and advisers;
- Providing customer support;
- Improving functionality, performance, and user experience;
- Conducting analytics, research, and product development;
- Detecting, preventing, and investigating fraud, security incidents, or misuse;
- Complying with legal, regulatory, and contractual obligations;
- Enforcing our terms and policies;
- Sending service-related notices and updates;
- Sending marketing communications where express consent has been obtained.

We may also use anonymised or aggregated information for analytics, benchmarking, and business improvement purposes. Such data will not identify any individual.

5. Disclosure of Personal Data

We do not sell personal data.

To the extent necessary for the relevant purpose, we may disclose personal data to:

- Cloud hosting and infrastructure providers;
- Analytics and technology service providers;
- Payment processors;
- Professional advisers, auditors, and insurers;
- Regulators, law enforcement agencies, or governmental authorities where required by law;
- Parties involved in corporate transactions such as mergers, acquisitions, or asset sales;
- Third-party integrations or service providers authorised by users.

All third-party service providers are contractually required to maintain appropriate confidentiality and security safeguards, and may only process personal data in accordance with our instructions.

6. Overseas Transfers of Personal Data

Your personal data may be transferred to, stored, or processed outside Singapore.

Before we transfer personal data outside Singapore, we will take reasonable steps to ensure that the receiving organisation provides a standard of protection comparable to that required under the PDPA, including through appropriate contractual arrangements or verification that the recipient country's laws provide adequate protection.

7. Data Retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable laws and regulations. As a general guide:

- Account and financial planning data: retained for the duration of the account relationship and for 7 years thereafter, in line with typical regulatory record-keeping requirements applicable to financial services;
- Technical and usage logs: retained for up to 36 months;
- Marketing-related data: retained until consent is withdrawn or the account is closed;
- Support communications: retained for up to 3 years.

When personal data is no longer required, we will take reasonable steps to securely delete, destroy, anonymise, or de-identify such data. Users may request deletion of their account and associated personal data by contacting our Data Protection Officer. Certain data may be retained longer if required by applicable law or for legitimate dispute resolution purposes.

8. Protection of Personal Data

We implement reasonable administrative, physical, and technical security safeguards to protect personal data against unauthorised access, collection, use, disclosure, copying, modification, disposal, or similar risks. Such safeguards include:

- Encryption of data in transit and at rest;
- Role-based access controls and least-privilege principles;
- Multi-factor authentication mechanisms;
- Secure hosting environments;
- Monitoring, logging, and alerting systems;
- Periodic security reviews and vulnerability assessments.

Given the sensitivity of financial planning data, enhanced access controls are applied to restrict access to financial information to authorised advisers and personnel only.

However, no method of transmission over the Internet or electronic storage is completely secure, and we cannot guarantee absolute security.

9. Cookies and Tracking Technologies

We use cookies and similar technologies to:

- Maintain platform functionality;
- Remember user preferences;
- Analyse traffic and usage patterns;
- Improve our services and user experience.

Users may modify browser settings to decline cookies, although certain features of the Platform may not function properly as a result.

10. Your Rights Under the PDPA

Subject to applicable laws, individuals may have the right to:

- Request access to their personal data in our possession;
- Request correction of inaccurate or incomplete personal data;
- Withdraw consent for certain processing activities;
- Request information about how their personal data has been used or disclosed.

Requests may be submitted using the contact details in Section 15. We may require reasonable time to process requests and may charge an administrative fee where permitted under applicable laws.

Where the Company acts as a data intermediary in respect of your personal data (see Section 16b below), we may refer your request to the data controller who will respond directly to you.

Withdrawal of consent may affect our ability to continue providing certain services. We will inform you of the likely consequences of any such withdrawal before processing your request.

11. Accuracy of Personal Data

Users should ensure that all personal data provided to us is accurate, complete, and up to date. Please inform us promptly of any changes to your personal data.

12. Third-Party Websites and Services

The Platform may contain links to third-party websites or services. We are not responsible for the privacy practices, content, or policies of third parties. Users should review the privacy policies of such third parties independently.

13. Children's Privacy

The Platform is not intended for individuals under 18 years of age. We do not knowingly collect personal data from children, except provided by their parents as our clients, for the purpose of financial analyses as part of our service rendered to our clients. If we become aware that children's personal data has inadvertently been collected, we will take reasonable steps to delete it promptly.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Any revised version will be published on our Platform with an updated effective date. For material changes, we will provide reasonable notice to users. Continued use of the Platform after such notice constitutes acceptance of the updated Privacy Policy.

15. Contact Us / Data Protection Officer

If you have any questions, requests, or complaints relating to this Privacy Policy or our handling of personal data, please contact our Legal & Data Protection Officer:

Legal & Data Protection Officer

F1GURES PTE. LTD.

Email: legal_dataprivacy@f1gures.com

Address: The Hangar by NUS Enterprise, i3 Building, 21 Heng Mui Keng Ter, Level 3, Singapore 119613

Response time: We aim to respond to all requests within 10 business days.

16. Data Controller and Data Intermediary Roles

The Company operates in two distinct capacities depending on the context in which personal data is processed:

a. As a Data Controller

When we collect personal data directly from users who register on the Platform (e.g., financial advisers creating accounts, or individuals interacting directly with us), we act as a data controller. In this capacity, we determine the purposes and means of processing personal data, and we are responsible for compliance with the PDPA in respect of such data.

b. As a Data Intermediary

When a licensed financial adviser firm ("Adviser Firm") uses the Platform to input and process personal data belonging to their clients, the Company acts as a data intermediary processing personal data on behalf of the Adviser Firm. In this capacity:

- The Adviser Firm remains the data controller responsible for obtaining all necessary consents from their clients and for the lawfulness of their data collection;
- The Company processes such data only in accordance with the instructions of the Adviser Firm and the terms of our service agreements;
- In the event of a data breach involving client data processed on behalf of an Adviser Firm, the Company will notify the relevant Adviser Firm without undue delay to enable the Adviser Firm to fulfil its own notification obligations under the PDPA.

Adviser Firms using the Platform as a data controller should ensure that their clients are informed of this Privacy Policy and of any separate privacy notices the Adviser Firm is required to provide.

Where required, the Company and Adviser Firms will enter into a Data Processing Addendum (DPA) governing the terms of data processing. Adviser Firms may request a copy of our standard DPA by contacting legal_dataprivacy@f1gures.com.

17. Data Breach Notification

We take data security seriously and have implemented technical and organisational measures designed to prevent data breaches. In the event of a data breach, we will respond in accordance with our obligations under the PDPA and any other applicable laws.

a. What Constitutes a Notifiable Breach

A data breach is notifiable under the PDPA if it meets either of the following thresholds:

- Significant harm: The breach results in, or is likely to result in, significant harm to affected individuals (e.g., financial loss, identity theft, or reputational damage); or
- Scale: The breach affects 500 or more individuals.

b. Our Notification Obligations

Where a data breach is assessed to be notifiable, and we are acting as a data controller:

- If we assess that the breach is notifiable, we will notify the Personal Data Protection Commission (PDPC) within 3 calendar days of completing our assessment; and
- We will notify affected individuals as required by the PDPA, and will provide the information in Section 17c below.

Where we are acting as a data intermediary, we will notify the relevant Adviser Firm without undue delay to enable them to fulfil their own notification obligations.

c. What We Will Tell You

Where we notify affected individuals of a data breach, our notification will include, to the extent known at the time:

- A description of the nature of the breach;
- The types of personal data affected;
- The potential harm (if any) caused by the breach;
- Measures taken or proposed to address the breach, and to eliminate or mitigate any potential harm to affected individuals;
- Steps that affected individuals can take to protect themselves; and
- Contact details for further enquiries.

d. Your Obligation to Notify Us

If you become aware of any unauthorised access to, or disclosure or misuse of, personal data stored on the Platform, please notify us immediately at legal_dataprivacy@f1gures.com so that we can take prompt remedial action.

18. Automated Processing and AI-Assisted Features

The Platform uses data analytics and, in certain features, AI-assisted tools to deliver financial planning insights, projections, and product recommendations. This section explains how automated processing works and what it means for you.

a. What We Automate

In order to provide services to you through the Platform, we may need to carry out automated processing of your personal data on the Platform, which may include:

- Generating financial projections and scenario models based on the information entered, which may include your personal data (e.g., income, expenses, goals, investment assumptions);
- Highlighting gaps between a user's current financial position and stated objectives;
- Surfacing categories of financial products or strategies that may be relevant to a user's goals;
- Usage analytics to improve Platform features and user experience.

b. Nature of AI-Generated Outputs

AI-assisted outputs on the Platform are tools to support, not replace, professional financial advice. The following limitations apply:

- All projections, scenarios, and product category suggestions generated by the Platform are illustrative and based solely on the data entered. They do not constitute personalised financial advice, and should not be relied upon as such;
- Recommendations for specific financial products require the independent assessment of a licensed financial adviser;
- AI-generated outputs may not account for all relevant factors affecting a user's financial situation, including factors not entered into the Platform;
- Past performance indicators used in modelling do not guarantee future results.

c. Human Review

Significant financial decisions should always be reviewed by a qualified financial adviser. The Platform is designed to assist advisers and users in structuring their planning conversations — not to make autonomous decisions.

Where any feature of the Platform is used in a way that produces outputs having legal or similarly significant effects on users, we will ensure that appropriate human oversight is maintained, in line with the PDPC's advisory guidelines on AI recommendation systems.

d. Model Training

We will not use individually identifiable personal data to train AI or machine learning models without your express consent. Where aggregated or anonymised data is used for model improvement, no individual will be identifiable from such data.

19. Governing Law, DNC Compliance, and Additional Matters

a. Governing Law

This Privacy Policy is governed by and construed in accordance with the laws of Singapore. Any disputes arising in connection with this Privacy Policy or our handling of personal data shall be subject to the exclusive jurisdiction of the courts of Singapore, unless the parties agree otherwise in writing.

b. Do Not Call (DNC) Registry Compliance

Where we or Adviser Firms using the Platform send marketing messages by telephone, SMS, or fax to Singapore numbers, we will check the Singapore Do Not Call (DNC) Registry in accordance with Part IX of the PDPA before doing so, unless the recipient has provided clear and unambiguous consent to the sending of marketing messages.

c. Account Deletion

Users who wish to close their account and request deletion of their personal data may do so by contacting legal_dataprivacy@f1gures.com. We will process such requests within 30 days, subject to our obligations to retain certain data under applicable law (see Section 7). We will confirm the completion of deletion in writing.

d. Singapore Governing Authority

The Personal Data Protection Commission (PDPC) is the regulatory authority responsible for administering the PDPA in Singapore. For more information about your rights or to lodge a complaint, visit www.pdpc.gov.sg.

Summary of Key Contacts

Legal & Data Protection Officer: legal_dataprivacy@f1gures.com

Data Breach Reports: legal_dataprivacy@f1gures.com

Account Deletion Requests: legal_dataprivacy@f1gures.com

DPA / B2B Enquiries: legal_dataprivacy@f1gures.com

Regulator (PDPC): www.pdpc.gov.sg

Business Address: 10 Pasir Panjang Road, #03-01, Mapletree Business City, Singapore 117438

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